

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Priorities USA, Rise, Inc., and the
Detroit/Downriver Chapter of the A.
Philip Randolph Institute,

Plaintiffs,

v.

Dana Nessel, in her official capacity as
Attorney General of the State of
Michigan,

Defendant.

NO. 20-10211

JUDGE MARK A. GOLDSMITH

MAGISTRATE JUDGE DAVID R.
GRAND

**PLAINTIFFS' MOTION FOR
EXPEDITED CONSIDERATION
OF MOTION FOR
PRELIMINARY AND
PERMANENT INJUNCTION,
EXPEDITED DISCOVERY, AND
CONSOLIDATION OF
HEARING ON MOTION FOR
PRELIMINARY INJUNCTION
WITH HEARING ON MERITS**

Pursuant to Eastern District of Michigan Local Rule 65.1 and 28 U.S.C. § 1657(a), Plaintiffs Priorities USA, Rise, Inc., and the Detroit/Downriver Chapter of the A. Philip Randolph Institute move for an order to (1) expedite consideration of their Motion for Preliminary Injunction (“Plaintiffs’ Motion”), filed concurrently; (2) expedite limited discovery related to Plaintiffs’ Motion; and (3) consolidate the hearing on Plaintiffs’ Motion with the trial on the merits, pursuant to Rule 65(a)(2) of the Federal Rules of Civil Procedure. The undersigned counsel certifies that counsel made no attempt to seek concurrence in the relief requested by this motion because counsel has not yet entered an appearance. Counsel did, however, send a

request for concurrence to counsel in *Priorities v. Nessel* Civil Action No. 19-13341 (E.D. Mich.) which was denied and will serve this motion on Defendant with the complaint.

In support of this motion, Plaintiffs rely on the facts, law, and argument set forth in the accompanying Brief in Support.

WHEREFORE, Plaintiffs respectfully request that this Court:

- a) Set expedited dates for briefing of this motion with a response due January 29 and a reply due January 31;
- b) Set dates for briefing Plaintiffs' Motion, with a Response to Plaintiffs' Motion on February 25, 2020 and Plaintiffs' Response on March 10, 2020;
- c) Set a deadline for additional affidavits in support or opposition to Plaintiff's Motion of April 10, 2020 with a deadline for any rebuttal expert declarations of April 17, 2020;
- d) Consider and resolve Plaintiffs' Motion on an expedited basis (with a hearing on or before May 1, 2020);
- e) Order Defendant to comply with Plaintiff's limited discovery requests within 14 days of this order but not later than February 14, 2020; and
- f) Consolidate the hearing for Plaintiffs' Motion with a trial on the merits.

Dated: January 28, 2020

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2020, I electronically filed the above document(s) with the Clerk of the Court using the ECF System and will serve the motion on Defendant with the Complaint.

LOCAL RULE CERTIFICATION

I, Marc Elias, certify that this document and complies with Local Rule 5.1(a), including: double-spaced (except for quoted materials and footnotes); at least one-inch margins on the top, sides, and bottom; consecutive page numbering; and type size of all text and footnotes that is no smaller than 10-1/2 characters per inch (for non-proportional fonts) or 14 point (for proportional fonts). I also certify that it is the appropriate length. Local Rule 7.1(d)(3).

Respectfully submitted,

By: /s/ Marc E. Elias

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